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8 Attorneys for Defendants



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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

13 IN RE JUNIPER DERIVATIVE ACTIONS

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15 This Document Relates To:

16 ALL ACTIONS  
17 \_\_\_\_\_  
18

No. 5:06-cv-03396-JW

STIPULATION AND [PROPOSED]  
ORDER RE TEMPORARY STAY

Date: N/A  
Time: N/A  
Before: Hon. James Ware

1        This Stipulation is entered into by and among Lead Plaintiffs the Indiana State District  
2        Council of Laborers and HOD Carriers Pension Fund, Employer-Teamsters Local Nos. 175 & 505  
3        Pension Trust Fund, and Timothy Hill, and defendants Juniper Networks, Inc., Scott Kriens,  
4        Stratton Sclavos, William Stensrud, Robert M. Calderoni, Kenneth A. Goldman, William R.  
5        Hearst III, Kenneth Levy, Frank J. Marshall, Vinod Khosla, Pradeep Sindhu, Robert Dykes,  
6        Marcel L. Gani, Peter L. Wexler, Ashok Krishnamurthi, and Lloyd Carney (the “Defendants”), by  
7        and through their respective attorneys of record.

8            WHEREAS, pursuant to the Stipulation and Order Regarding Briefing Schedule dated  
9        May 22, 2007, the parties agreed:

10            1.        Defendants shall file and serve their response(s) to the Verified Consolidated  
11        Shareholders Derivative Complaint on or before June 15, 2007; and

12            2.        Plaintiffs shall file and serve their opposition within 45 days after service of  
13        Defendants’ response(s); and

14            3.        Defendants shall file and serve their reply 21 days after service of the opposition;

15            WHEREAS, through their respective counsel, the above-named Defendants and Plaintiffs  
16        have agreed to pursue settlement discussions and/or mediation;

17            WHEREAS, the Defendants and Plaintiffs believe that it would conserve the resources of  
18        the Court and the parties if motion practice and proceedings are temporarily stayed to allow the  
19        parties time to conduct settlement discussions and/or mediation;

20            NOW, THEREFORE, Defendants and Plaintiffs, by and through their respective counsel,  
21        hereby stipulate and agree to, and ask the Court to approve, the following:

22            1.        The current deadlines and briefing schedule for Defendants’ response(s) to the  
23        Verified Consolidated Shareholders Derivative Complaint shall be vacated;

24            2.        This case will be temporarily stayed to allow the parties time to conduct  
25        settlement discussions and/or mediation; and

26            3.        In August 2007, the parties shall meet and confer, and confer with the Court, to

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1 set a further Case Management Conference at which to revisit the status of the case.

2 IT IS SO STIPULATED.

3 DATED: June 8, 2007

WILSON SONSINI GOODRICH & ROSATI, P.C.  
NINA F. LOCKER  
STEVEN GUGGENHEIM  
JONI OSTLER

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/s/ Joni Ostler  
JONI OSTLER

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9 Attorneys for Defendants

10 DATED: June 8, 2007

LERACH COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
TRAVIS E. DOWNS III  
BENNY C. GOODMAN II

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/s/ Travis E. Downs III  
TRAVIS E. DOWNS III

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DATED: June 8, 2007

SCHIFFRIN, BARROWAY, TOPAZ &  
KESSLER, LLP  
ERIC L. ZAGAR  
ROBIN WINCHESTER  
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/s/ Robin Winchester  
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25 ORDER PURSUANT TO STIPULATION

26 The above entitled case is stayed until September 10, 2007. All deadlines are hearing are  
27 VACATES. The parties shall appear for a Status Conference on September 10, 2007. The parties  
shall meet and confer and file a joint status statement ten (10) days before the date of the  
conference.

28 Date: June 12, 2007

  
JAMES L. WARE  
United States District Judge

1 I, Joni Ostler, am the ECF user whose identification and password are being used to  
2 file the STIPULATION AND [PROPOSED] ORDER RE TEMPORARY STAY. In  
3 compliance with General Order 45.X.B, I hereby attest that both Travis Downs III and Robin  
4 Winchester have concurred in this filing.

5

6 Dated: June 8, 2007

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

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By: /s/ Joni Ostler  
Joni Ostler

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**CERTIFICATE OF SERVICE VIA EMAIL**

10 I, Joni Ostler, declare:

11 I am employed in Santa Clara County. I am over the age of 18 years and not a party to  
12 the within action. My business address is Wilson Sonsini Goodrich & Rosati, 650 Page Mill  
13 Road, Palo Alto, California 94304-1050.

14 I am readily familiar with Wilson Sonsini Goodrich & Rosati's practice for collection and  
15 processing of documents for transmittal via e-mail.

16 Pursuant to the Order Following Case Management Conference entered by the Court on  
17 October 20, 2006, I served the foregoing STIPULATION AND [PROPOSED] ORDER RE  
18 TEMPORARY STAY on lead counsel for the appointed lead plaintiffs, and counsel for  
19 defendant Ernst & Young, in the related action *In re Juniper Networks, Inc. Securities Litigation*,  
20 No. C06-04327-JW, as listed below, via email as attachments by following ordinary business  
21 practices at Wilson Sonsini Goodrich & Rosati:

22 Richard Bemporad  
23 Email: rbemporad@lowey.com  
24 David C. Harrison  
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*Counsel for Defendant Ernst & Young*

15 I declare under penalty of perjury under the laws of the State of California that the  
16 foregoing is true and correct. Executed at Palo Alto, California on June 8, 2007.

/s/ Joni Ostler  
Joni Ostler